



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

March 3, 2011

MEMORANDUM

SUBJECT: Notice of Citizen Suit filed under the Clean Air Act

FROM: *for* *Deborah Garber*
Deborah Garber
Section Chief, MM Branch II, Section I
Office of Regional Counsel
ORC Liaison to AE Division

TO: George Czerniak, Chief
Air Enforcement & Compliance Assurance Branch
Air and Radiation Division

Enclosed please find a notice of intent to file suit #77 concerning "Sierra Club vs. Western District of Michigan and Michigan's State Implementation Plan at the James De Young Generating Station for violations of the Clean Air Act's prevention of significant deterioration (PSD) requirements; violations of the operating permits issued to the Plant and violations of various permitting requirements contained in Michigan SIP.

This notice is provided in the event you wish to pursue this matter.

Please call me at 6-6610 if you have any questions.

cc: Eric Cohen, ORC

Attachment



McGILLIVRAY
WESTERBERG
& BENDER LLC
ATTORNEYS



February 10, 2011

VIA CERTIFIED MAIL

Holland Board of Public Works
c/o Chairperson
625 Hastings Avenue
Holland, MI 49423

Loren Howard
General Manager
or Managing Agent of James De Young Generation Station
625 Hastings Avenue
Holland, MI 49423

City of Holland
Mayor Kurt Dykstra
or Owner of James De Young Generation Station
270 S. River Ave.
Holland, MI 49423

RECEIVED

FEB 16 2011

OFFICE OF REGIONAL DEVELOPMENT

Re: Notice of Intent to Sue under the Clean Air Act and Michigan's State
Implementation Plan

To Whom It May Concern:

On behalf of the Sierra Club, including its more than 18,000 Michigan members, we are writing to notify you pursuant to 42 U.S.C. § 7604(b) and 40 C.F.R. part 54 that Sierra Club intends to file a Clean Air Act lawsuit against you in the Western District of Michigan, or to amend any pending lawsuit, for violations of the Clean Air Act and Michigan's State Implementation Plan (SIP) at the James De Young Generation Station located at 64 Pine Ave., Holland, Michigan. This notice supplements and does not replace or otherwise affect any prior notice(s).

Consistent with the notice requirements in the federal regulations, you are hereby notified that the full name and address of the person giving notice is Sierra Club (on behalf of its affected members):

Michigan Chapter Office
109 E. Grand River Avenue
Lansing, MI 48906
(517) 484-2372

National Headquarters
85 Second Street
San Francisco, CA 94105
(415) 977-5500.

However, if you wish to discuss this matter, please contact counsel for the Sierra Club:

David C. Bender
McGillivray Westerberg & Bender LLC
305 S. Paterson Street
Madison, WI 53703
(608) 310-3560
bender@mwbattoorneys.com

The James De Young Generation Station releases numerous air pollutants, including sulfur oxides (SOx), nitrogen oxides (NOx), carbon dioxide (CO₂), carbon monoxide (CO), mercury, particulate matter, and others.

I. Violations Related To Unpermitted Construction Activities.

Construction and modification of a major new source of air pollution without a lawful permit violates the Clean Air Act and Michigan's SIP and adversely affects the environmental, health, and economic interests of the Sierra Club and its members. Sierra Club submits that modifications have been made at the James De Young Generation Station (De Young) without the requisite permits. The violations described in this Notice injure, and unless abated will continue to injure, the economic, aesthetic, health, and recreational interests of Sierra Club's members.

As described in detail below, Sierra Club alleges violations of the Michigan State Implementation Plan (SIP); violations of the Clean Air Act's prevention of significant deterioration (PSD) requirements; violations of the operating permits issued to the Plant; and violations of various permitting requirements contained in Michigan's SIP.

Violations of the Requirement to Obtain a Permit to Install, Mich. Admin. Code § 336.1201, *et seq.*

Michigan's SIP requires any person who installs, constructs, reconstructs, or modifies any process or process equipment which may emit any criteria pollutant under the Act or any air contaminant to obtain a Permit to Install (PTI) prior to undertaking the installation, construction, reconstruction, or modification. R. 336.1201(1). Further, a Permit to Install is required to operate a modified source until either a new PTI is issued or the requirements of the PTI are incorporated into a Renewable Operating Permit. Mich. Admin. Code § 336.1201(6).

Michigan's SIP defines "modify" as making a physical change in, or change in the method of operation of, existing process or process equipment which increases the amount of any air contaminant emitted into the outer air which is not already allowed to be emitted under the conditions of a permit or order or which results in the emission of any toxic air contaminant into the outer air not previously emitted. R. 336.1113(e). The SIP defines "process" as an action, operation, or a series of actions or operations at a source that emits or has the potential to emit an air contaminant. "Process equipment" means all equipment, devices, and auxiliary components, including air pollution control equipment, stacks, and other emission points, used in a process. R. 336.1116(p) and (q).

The City of Holland and the Holland Board of Public Works, each or together, own and operate the De Young plant. At various times, the owners and operators of the plants commenced construction of one or more modifications affecting the processes or process equipment at the plant and increasing the amount of one or more air contaminants emitted into the atmosphere. These modifications include, but are not limited to:

Modifications to De Young Generating Station

1. In 1999, new "low NOx burners" were installed on the James De Young Unit 5 boiler.
2. In or about 1995, a new control system was installed at the James De Young plant.

According to sworn testimony, these were large projects and involved a period of tuning and "shake down." According to Holland Board of Public Works employees, "normal operations" had not begun prior to these projects because of the period of tuning and "shake down" required after each.

Each of these modifications increased the amount of one or more air contaminants emitted into the outer air which was not already allowed to be emitted under the conditions of a permit or order. By undertaking the foregoing modifications without obtaining a PTI, the owners and operators of the De Young Plant violated and continue to violate Mich. Admin. Code § 336.1201 of the Michigan SIP for which Sierra Club hereby notifies you of its intent to file suit to enforce.

II. Violations of Emission Limitations.

Each of the projects identified in Section I, above, also constitutes a major modification for purposes of the Prevention of Significant Deterioration (PSD) program of the Clean Air Act, 42 U.S.C. § 7470, *et seq.*; Mich. Admin. Code § 336.2801 *et seq.* As a modified source, each of the three existing generating units at the De Young plant are required by 42 U.S.C. § 7475(a)(4) and Mich. Admin. Code §§ 336.2810(1) and (3) to meet emission limits, including the applicable standards in 40 C.F.R. parts 60 and 61 and limits representing Best Available Control Technology (BACT), as defined in 42 U.S.C. § 7479(3) and Mich. Admin. Code § 336.2801(f). Beginning on the date that construction commenced on each of the modifications above, and continuing on each day of operation through the date of this notice, the De Young plant has failed to comply with 40 C.F.R. parts 60 and 61 and with BACT. Each day following the first day on which construction commenced at each separate

unit constitutes a separate and additional violation of the Clean Air Act. Sierra Club hereby notifies you of its intent to file suit to enforce.

III. Violations of State Implementation Plan and Operating Permit.

The James De Young plant is required to operate in accordance with the Michigan State Implementation Plan and all federally-enforceable permits issued to the facility. One such permit is Renewable Operating Permit (ROP) MI-ROP-B2357-2006a. Pursuant to Rules 330 and 910 of the Michigan SIP and Section 1.C. of the ROP, the boilers of Units 3, 4 and 5 at the James De Young plant are prohibited from operating at any time, including startup and shutdown periods, unless the electrostatic precipitators are installed and operating properly.

On numerous occasions known to you by referencing your own continuous opacity monitoring records, there have been problems with the electrostatic precipitators wherein the precipitators were not operating properly while the boilers were operating. These events constitute violations of Rule 330, Mich. Admin. Code R.336.1331, and Rule 910, Mich. Admin. Code R. 336.1910, as well as violations of the ROP. See Permit (ROP) MI-ROP-B2357-2006a at pp. 20, 24 and 28 ("The permittee shall not operate the units, including startup and shutdown, unless the electrostatic precipitators are installed and operating properly, in accordance with safe operating practices. (R 336.1301, R 336.1330, R 336.1331, R 336.1910)").

These violations include, but are not necessarily limited to, those identified in Exhibit A. To determine all violations covered by this notice, please reference your own files for each instance when a boiler connected to De Young units 3, 4, or 5 was operating and the electrostatic precipitator connected to that unit was not properly functioning. These instances may be identified in the "cause code" data in your continuous opacity monitoring data.

Offer to Resolve Prior to Filing

The Sierra Club is not opposed to resolving disputes short of litigation. Therefore, we look forward to you contacting us to try and resolve this matter, especially if you believe any information in this letter is incorrect. However, if we do not hear from you within 30 days, we will assume you are not interested in trying to resolve this matter and will proceed to file a complaint, or amend our complaint as necessary, in federal district court. We will seek declaratory relief, civil penalties, costs of litigation, injunctive relief (including an off-set of illegal emissions), and other appropriate relief.

Sincerely,

MCGILLIVRAY WESTEBERG & BENDER LLC



David C. Bender

Cc:

Via Certified Mail to:

Lisa Jackson, Administrator
United States Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Director
Michigan Department of Natural Resources and the Environment
Department of Environmental Quality
525 West Allegan Street
Lansing, MI 48913

Rick Snyder
Governor of Michigan
P.O. Box 30013
Lansing, Michigan 48909

Dr. Susan Hedman
Regional Administrator
US EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Via U.S. Mail to:

Cary Perlman
Karl Karg
Margrethe Kearney
Andrea Hogan
Latham & Watkins LLP
233 S. Wacker Drive, Suite 5800
Chicago, IL 60606

Charles Denton
Barnes & Thornburg LLP
171 Monroe Avenue NW, Suite 1000
Grand Rapids, MI 49503

Exhibit A

De Young Unit 3

Date Occurred	Time Affected		Time (hours)	Cause
	Start	Stop		
10/31/2005	9:12	9:24	0.3	0.3 BOILER STARTUP
11/28/2005	10:12	10:12	0.1	0.1 PRECIP. FIELD MAINTENANCE
7/14/2006	4:48	4:48	0.1	0.1 SOOT BLOWING
7/14/2006	5:06	5:06	0.1	0.1 SOOT BLOWING
7/14/2006	5:12	5:12	0.1	0.1 BOILER UPSET
7/14/2006	5:18	5:24	0.2	0.2 SOOT BLOWING
7/14/2006	5:36	5:36	0.1	0.1 SOOT BLOWING
7/14/2006	5:48	5:48	0.1	0.1 BOILER UPSET
7/14/2006	6:12	6:12	0.1	0.1 SOOT BLOWING
7/15/2006	3:30	3:30	0.1	0.1 BOILER UPSET
7/15/2006	3:42	4:24	0.8	0.8 BOILER UPSET
7/15/2006	4:48	4:54	0.2	0.2 BOILER UPSET
12/8/2007	17:12	17:12	0.1	0.1 BOILER STARTUP
12/8/2007	17:24	17:24	0.1	0.1 BOILER STARTUP
12/9/2007	10:06	10:06	0.1	0.1 BOILER STARTUP
3/31/2008	8:36	8:42	0.2	0.2 PRECIP. FIELD MAINTENANCE

De Young Unit 4

Date Occurred	Time Affected		Time (Hours)	Cause
	Start	Stop		
7/7/2005	11:54	11:54	0.1	0.1 PRECIP. FIELD MAINTENANCE
7/7/2005	12:24	12:24	0.1	0.1 PRECIP. FIELD MAINTENANCE
7/14/2005	7:36	7:36	0.1	0.1 PRECIP. FIELD MAINTENANCE
7/14/2005	13:54	13:54	0.1	0.1 PRECIP. RAPPER TROUBLE
7/21/2005	8:00	8:06	0.2	0.2 PRECIP. FIELD MAINTENANCE
7/28/2005	10:00	10:00	0.1	0.1 PRECIP FIELD MAINTENANCE
8/4/2005	7:36	7:36	0.1	0.1 PRECIP. FIELD MAINTENANCE
8/18/2005	7:36	7:36	0.1	0.1 PRECIP FIELD MAINTENANCE
8/25/2005	9:18	9:24	0.2	0.2 PRECIP. FIELD MAINTENANCE
9/1/2005	9:42	9:48	0.2	0.2 PRECIP FIELD MAINTENANCE
9/2/2005	22:42	22:42	0.1	0.1 BOILER UPSET
9/15/2005	9:30	9:30	0.1	0.1 PRECIP FIELD MAINTENANCE
10/16/2005	22:06	22:06	0.1	0.1 BOILER UPSET
10/20/2005	9:48	9:48	0.1	0.1 PRECIP. FIELD MAINTENANCE
10/20/2005	12:36	12:36	0.1	0.1 PRECIP. FIELD MAINTENANCE
11/3/2005	10:30	10:30	0.1	0.1 PRECIP. FIELD MAINTENANCE
12/9/2005	11:54	11:54	0.1	0.1 PRECIP. FIELD MAINTENANCE
12/15/2005	10:30	10:30	0.1	0.1 PRECIP. FIELD MAINTENANCE
3/16/2006	10:00	10:06	0.2	0.2 PRECIP. FIELD MAINTENANCE
3/16/2006	10:18	10:18	0.1	0.1 PRECIP. FIELD MAINTENANCE
3/27/2006	6:00	6:00	0.1	0.1 BOILER UPSET
3/30/2006	14:12	14:18	0.2	0.2 PRECIP. FIELD MAINTENANCE

3/30/2006	14:42	14:42	0.1	0.1 PRECIP. FIELD MAINTENANCE
4/6/2006	12:24	12:30	0.2	0.2 PRECIP. FIELD MAINTENANCE
4/6/2006	12:48	12:48	0.1	0.1 PRECIP. FIELD MAINTENANCE
4/13/2006	12:00	12:12	0.3	0.3 PRECIP. FIELD MAINTENANCE
4/13/2006	12:24	12:24	0.1	0.1 PRECIP. FIELD MAINTENANCE
7/23/2006	3:54	3:54	0.1	0.1 BOILER STARTUP
7/31/2006	12:00	12:00	0.1	0.1 BOILER UPSET
8/7/2006	9:06	9:06	0.1	0.1 PRECIP. RAPPER TROUBLE
8/7/2006	9:30	9:30	0.1	0.1 PRECIP. RAPPER TROUBLE
8/7/2006	9:42	9:42	0.1	0.1 PRECIP. RAPPER TROUBLE
8/7/2006	10:00	10:00	0.1	0.1 PRECIP. RAPPER TROUBLE
8/7/2006	10:18	10:42	0.5	0.5 PRECIP. RAPPER TROUBLE
8/17/2006	9:24	9:24	0.1	0.1 PRECIP. FIELD MAINTENANCE
8/17/2006	12:06	12:06	0.1	0.1 ASH HANDLING TROUBLE
8/31/2006	9:42	9:42	0.1	0.1 PRECIP. FIELD MAINTENANCE
10/20/2006	10:00	10:00	0.1	0.1 PRECIP. FIELD MAINTENANCE
10/26/2006	9:42	9:48	0.2	0.2 PRECIP. FIELD MAINTENANCE
11/2/2006	11:30	11:36	0.2	0.2 PRECIP. FIELD MAINTENANCE
11/9/2006	7:54	8:18	0.5	0.5 PRECIP. FIELD MAINTENANCE
11/9/2006	8:36	8:48	0.3	0.3 PRECIP. FIELD MAINTENANCE
11/16/2006	9:42	10:24	0.8	0.8 PRECIP. FIELD MAINTENANCE
11/16/2006	11:00	11:12	0.3	0.3 PRECIP. FIELD MAINTENANCE
11/16/2006	13:24	13:24	0.1	0.1 ASH HANDLING TROUBLE
11/18/2006	9:06	9:24	0.4	0.4 BOILER UPSET
11/18/2006	11:12	11:24	0.3	0.3 ASH HANDLING TROUBLE
11/22/2006	10:18	10:36	0.4	0.4 PRECIP. FIELD MAINTENANCE
11/22/2006	11:18	11:30	0.3	0.3 PRECIP. FIELD MAINTENANCE
11/30/2006	10:24	10:30	0.2	0.2 PRECIP. FIELD MAINTENANCE
12/7/2006	9:12	9:24	0.3	0.3 PRECIP. FIELD MAINTENANCE
12/14/2006	10:30	10:42	0.3	0.3 PRECIP. FIELD MAINTENANCE
12/15/2006	17:12	17:48	0.7	0.7 PRECIP. FIELD MAINTENANCE
12/21/2006	10:48	10:48	0.1	0.1 PRECIP. FIELD MAINTENANCE
12/15/2006	19:24	19:30	0.2	0.2 PRECIP. RAPPER TROUBLE
12/28/2006	10:24	10:24	0.1	0.1 PRECIP. FIELD MAINTENANCE
1/11/2007	9:36	9:48	0.3	0.3 PRECIP. FIELD MAINTENANCE
1/11/2007	10:18	10:24	0.2	0.2 PRECIP. FIELD MAINTENANCE
1/18/2007	12:54	14:24	1.6	1.6 PRECIP. FIELD MAINTENANCE
1/18/2007	14:42	14:54	0.3	0.3 PRECIP. FIELD MAINTENANCE
1/25/2007	14:30	14:36	0.2	0.2 PRECIP. FIELD MAINTENANCE
1/31/2007	12:54	12:54	0.2	0.2 BOILER UPSET
1/31/2007	13:18	13:36	0.4	0.4 PRECIP. FIELD MAINTENANCE
2/2/2007	13:54	14:00	0.2	0.2 PRECIP. FIELD MAINTENANCE
2/2/2007	14:30	14:36	0.2	0.2 PRECIP. FIELD MAINTENANCE
2/7/2007	11:18	11:18	0.1	0.1 PRECIP. FIELD MAINTENANCE
2/14/2007	9:36	9:54	0.4	0.4 PRECIP. FIELD MAINTENANCE
2/14/2007	10:30	10:36	0.2	0.2 PRECIP. FIELD MAINTENANCE
2/16/2007	9:42	9:42	0.1	0.1 PRECIP. FIELD MAINTENANCE
2/16/2007	10:54	10:54	0.2	0.2 PRECIP. FIELD MAINTENANCE
2/19/2007	14:18	14:24	0.2	0.2 PRECIP. FIELD MAINTENANCE
2/19/2007	14:48	15:00	0.3	0.3 PRECIP. FIELD MAINTENANCE
3/9/2007	13:42	13:54	0.3	0.3 PRECIP. FIELD MAINTENANCE
3/9/2007	14:30	14:42	0.3	0.3 PRECIP. FIELD MAINTENANCE
3/16/2007	9:24	9:30	0.2	0.2 PRECIP. FIELD MAINTENANCE

3/23/2007	9:30	9:36	0.2	0.2 PRECIP. FIELD MAINTENANCE
3/30/2007	8:42	9:00	0.4	0.4 PRECIP. FIELD MAINTENANCE
3/30/2007	9:36	9:48	0.3	0.3 PRECIP. FIELD MAINTENANCE
4/4/2007	11:48	11:54	0.2	0.2 ASH HANDLING TROUBLE
4/4/2007	12:06	12:06	0.1	0.1 ASH HANDLING TROUBLE
4/5/2007	12:42	12:42	0.1	0.1 PRECIP. FIELD MAINTENANCE
4/22/2007	11:06	11:06	0.1	0.1 BOILER STARTUP
5/31/2007	12:42	12:48	0.2	0.2 PRECIP. FIELD MAINTENANCE
6/12/2007	7:36	7:42	0.2	0.2 PRECIP. FIELD MAINTENANCE
6/14/2007	13:54	13:54	0.1	0.1 BOILER UPSET
6/15/2007	12:00	12:06	0.2	0.2 BOILER UPSET
6/24/2007	19:42	19:42	0.1	0.1 BOILER STARTUP
7/19/2007	9:54	10:06	0.3	0.3 PRECIP. FIELD MAINTENANCE
7/30/2007	14:06	14:06	0.1	0.1 PRECIP. FIELD MAINTENANCE
7/31/2007	12:12	12:12	0.1	0.1 BOILER UPSET
7/31/2007	12:24	12:24	0.1	0.1 ASH HANDLING TROUBLE
8/1/2007	9:42	9:42	0.1	0.1 BOILER UPSET
8/2/2007	10:24	10:24	0.1	0.1 BOILER UPSET
8/2/2007	12:42	12:54	0.3	0.3 PRECIP. FIELD MAINTENANCE
8/3/2007	10:06	10:18	0.3	0.3 BOILER UPSET
8/3/2007	10:30	10:30	0.1	0.1 BOILER UPSET
8/10/2007	7:18	7:24	0.2	0.2 PRECIP. FIELD MAINTENANCE
8/16/2007	9:12	9:18	0.2	0.2 PRECIP. FIELD MAINTENANCE
8/23/2007	10:48	10:54	0.2	0.2 PRECIP. FIELD MAINTENANCE
8/30/2007	9:42	9:48	0.2	0.2 PRECIP. FIELD MAINTENANCE
9/6/2007	12:30	12:30	0.1	0.1 PRECIP. FIELD MAINTENANCE
9/13/2007	8:54	9:00	0.2	0.2 PRECIP FIELD MAINTENANCE
9/21/2007	12:18	12:30	0.3	0.3 PRECIP. FIELD MAINTENANCE
9/26/2007	12:06	12:06	0.1	0.1 ASH HANDLING TROUBLE
9/26/2007	17:00	17:00	0.1	0.1 SOOT BLOWING
9/27/2007	9:06	9:24	0.4	0.4 PRECIP. FIELD MAINTENANCE
9/27/2007	9:54	9:54	0.1	0.1 PRECIP. FIELD MAINTENANCE
9/27/2007	10:06	10:12	0.2	0.2 PRECIP. FIELD MAINTENANCE
10/2/2007	5:00	5:00	0.1	0.1 BOILER UPSET
10/2/2007	12:00	12:06	0.2	0.2 ASH HANDLING TROUBLE
10/2/2007	12:18	12:30	0.3	0.3 ASH HANDLING TROUBLE
10/4/2007	11:54	12:06	0.3	0.3 ASH HANDLING TROUBLE
10/4/2007	12:18	12:18	0.1	0.1 ASH HANDLING TROUBLE
10/4/2007	12:24	13:18	1.0	1 PRECIP. FIELD MAINTENANCE
11/1/2007	10:08	10:12	0.2	0.2 PRECIP. FIELD MAINTENANCE
11/8/2007	10:36	11:00	0.5	0.5 PRECIP. FIELD MAINTENANCE
11/8/2007	11:48	12:00	0.3	0.3 PRECIP. FIELD MAINTENANCE
11/14/2007	12:54	12:54	0.1	0.1 ASH HANDLING TROUBLE
11/15/2007	10:18	10:24	0.2	0.2 PRECIP. FIELD MAINTENANCE
11/16/2007	12:48	12:54	0.2	0.2 ASH HANDLING TROUBLE
11/16/2007	14:24	14:30	0.2	0.2 PRECIP. FIELD MAINTENANCE
11/16/2007	14:48	14:54	0.2	0.2 PRECIP. FIELD MAINTENANCE
11/18/2007	9:18	9:18	0.1	0.1 PRECIP. FIELD MAINTENANCE
11/18/2007	18:18	18:18	0.1	0.1 SOOT BLOWING
11/19/2007	5:36	5:36	0.1	0.1 SOOT BLOWING
11/19/2007	6:42	6:42	0.1	0.1 BOILER UPSET
11/19/2007	6:48	6:48	0.1	0.1 PRECIP. RAPPER TROUBLE
11/19/2007	7:00	7:00	0.1	0.1 PRECIP. RAPPER TROUBLE

11/21/2007	11:30	11:36	0.2	0.2 PRECIP. FIELD MAINTENANCE
11/29/2007	9:42	10:00	0.4	0.4 PRECIP. FIELD MAINTENANCE
11/29/2007	10:24	10:36	0.3	0.3 PRECIP. FIELD MAINTENANCE
12/6/2007	7:24	7:24	0.1	0.1 BOILER UPSET
12/6/2007	7:36	7:36	0.1	0.1 BOILER UPSET
12/6/2007	9:36	9:54	0.4	0.4 PRECIP. FIELD MAINTENANCE
12/6/2007	10:06	10:06	0.1	0.1 PRECIP. FIELD MAINTENANCE
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12/9/2007	10:30	10:30	0.1	0.1 ASH HANDLING TROUBLE
12/10/2007	7:54	7:54	0.1	0.1 BOILER UPSET
12/10/2007	8:06	8:06	0.1	0.1 BOILER UPSET
12/10/2007	8:48	9:18	0.6	0.6 BOILER UPSET
12/10/2007	9:24	10:06	0.8	0.8 PRECIP. RAPPER TROUBLE
12/10/2007	10:18	10:18	0.1	0.1 PRECIP. RAPPER TROUBLE
12/10/2007	10:24	10:30	0.2	0.2 PRECIP. FIELD MAINTENANCE
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12/12/2007	19:48	19:48	0.1	0.1 BOILER UPSET
12/12/2007	20:00	20:12	0.3	0.3 BOILER UPSET
12/12/2007	20:24	20:24	0.1	0.1 PRECIP. RAPPER TROUBLE
12/12/2007	20:30	20:30	0.1	0.1 BOILER UPSET
12/12/2007	20:42	20:42	0.1	0.1 BOILER UPSET
12/12/2007	21:00	21:00	0.1	0.1 PRECIP. RAPPER TROUBLE
12/12/2007	21:06	21:06	0.1	0.1 BOILER UPSET
12/12/2007	21:18	21:18	0.1	0.1 BOILER UPSET
12/12/2007	21:24	21:48	0.5	0.5 PRECIP. FIELD MAINTENANCE
12/13/2007	12:48	12:48	0.1	0.1 BOILER UPSET
12/13/2007	12:48	12:48	0.1	0.1 BOILER UPSET
12/14/2007	14:48	14:48	0.1	0.1 PRECIP. FIELD MAINTENANCE
12/17/2007	10:48	11:00	0.3	0.3 PRECIP FIELD MAINTENANCE
12/17/2007	11:30	11:36	0.2	0.2 PRECIP. FIELD MAINTENANCE
12/18/2007	12:42	12:42	0.1	0.1 PRECIP. FIELD MAINTENANCE
12/18/2007	12:48	12:54	0.2	0.2 ASH HANDLING TROUBLE
12/18/2007	13:54	14:24	0.6	0.6 PRECIP. FIELD MAINTENANCE
12/19/2007	9:36	9:48	0.3	0.3 PRECIP. FIELD MAINTENANCE
12/19/2007	12:54	13:06	0.3	0.3 PRECIP. FIELD MAINTENANCE
12/22/2007	8:30	8:36	0.2	0.2 PRECIP. FIELD MAINTENANCE
12/28/2007	11:36	11:36	0.1	0.1 PRECIP. FIELD MAINTENANCE
12/28/2007	13:06	13:06	0.1	0.1 PRECIP. FIELD MAINTENANCE
12/28/2007	13:36	13:48	0.3	0.3 PRECIP. FIELD MAINTENANCE
1/1/2008	18:48	18:48	0.1	0.1 BOILER UPSET
1/1/2008	19:06	19:06	0.1	0.1 BOILER UPSET
1/1/2008	19:18	19:18	0.1	0.1 BOILER UPSET
1/2/2008	9:48	10:00	0.3	0.3 PRECIP. FIELD MAINTENANCE
1/2/2008	10:24	10:30	0.2	0.2 PRECIP. FIELD MAINTENANCE
1/4/2008	13:30	13:48	0.4	0.4 PRECIP. FIELD MAINTENANCE
1/4/2008	14:18	14:24	0.2	0.2 PRECIP. FIELD MAINTENANCE
1/10/2008	9:30	9:54	0.5	0.5 PRECIP. FIELD MAINTENANCE
1/10/2008	10:06	10:06	0.1	0.1 PRECIP. FIELD MAINTENANCE
1/10/2008	10:18	10:30	0.3	0.3 PRECIP. FIELD MAINTENANCE
1/17/2008	9:42	10:06	0.5	0.5 PRECIP. FIELD MAINTENANCE
1/17/2008	10:24	10:42	0.4	0.4 PRECIP. FIELD MAINTENANCE
1/20/2008	10:30	10:30	0.1	0.1 ASH HANDLING TROUBLE

1/20/2008	18:06	18:06	0.1	0.1 SOOT BLOWING
1/21/2008	6:06	6:18	0.3	0.3 SOOT BLOWING
1/23/2008	17:54	17:54	0.1	0.1 SOOT BLOWING
1/23/2008	23:00	23:00	0.1	0.1 BOILER UPSET
1/24/2008	13:18	13:18	0.1	0.1 PRECIP. FIELD MAINTENANCE
1/24/2008	14:30	14:42	0.3	0.3 PRECIP. FIELD MAINTENANCE
1/27/2008	7:30	7:30	0.1	0.1 BOILER UPSET
1/28/2008	7:18	7:18	0.1	0.1 BOILER UPSET
1/28/2008	7:30	7:30	0.1	0.1 BOILER UPSET
1/28/2008	8:24	8:24	0.2	0.2 BOILER UPSET
1/30/2008	5:48	5:54	0.2	0.2 BOILER UPSET
1/30/2008	6:12	6:12	0.1	0.1 BOILER UPSET
1/30/2008	6:18	6:18	0.1	0.1 SOOT BLOWING
1/30/2008	6:54	6:54	0.1	0.1 BOILER UPSET
1/30/2008	7:30	7:30	0.1	0.1 BOILER UPSET
1/30/2008	8:06	8:06	0.1	0.1 BOILER UPSET
1/30/2008	8:24	8:24	0.1	0.1 BOILER UPSET
1/30/2008	8:36	8:36	0.1	0.1 BOILER UPSET
1/31/2008	9:48	9:48	0.1	0.1 PRECIP. FIELD MAINTENANCE
1/31/2008	10:00	10:00	0.1	0.1 PRECIP. FIELD MAINTENANCE
1/31/2008	10:30	10:48	0.4	0.4 PRECIP FIELD MAINTENANCE
2/2/2008	18:30	18:30	0.1	0.1 SOOT BLOWING
2/2/2008	23:12	23:12	0.1	0.1 BOILER UPSET
2/3/2008	9:42	9:42	0.1	0.1 BOILER UPSET
2/3/2008	9:54	9:54	0.1	0.1 BOILER UPSET
2/3/2008	10:24	10:30	0.2	0.2 ASH HANDLING TROUBLE
2/3/2008	14:36	14:48	0.3	0.3 PRECIP. FIELD MAINTENANCE
2/3/2008	15:18	15:30	0.3	0.3 PRECIP. FIELD MAINTENANCE
2/4/2008	8:18	8:18	0.2	0.2 BOILER UPSET
2/4/2008	7:12	8:36	0.2	0.2 BOILER UPSET
2/7/2008	10:42	10:54	0.3	0.3 PRECIP. FIELD MAINTENANCE
2/15/2008	10:06	10:12	0.2	0.2 PRECIP. FIELD MAINTENANCE
2/21/2008	10:12	10:24	0.3	0.3 PRECIP. FIELD MAINTENANCE
2/26/2008	8:48	9:00	0.3	0.3 PRECIP. FIELD MAINTENANCE
2/26/2008	17:48	17:48	0.1	0.1 PRECIP. FIELD MAINTENANCE
3/4/2008	5:42	5:42	0.1	0.1 SOOT BLOWING
3/4/2008	13:06	13:06	0.1	0.1 ASH HANDLING TROUBLE
3/6/2008	10:48	11:00	0.3	0.3 PRECIP. FIELD MAINTENANCE
3/13/2008	12:48	13:00	0.3	0.3 PRECIP. FIELD MAINTENANCE
3/20/2008	10:30	10:42	0.3	0.3 PRECIP. FIELD MAINTENANCE
4/4/2008	11:54	11:54	0.1	0.1 SOOT BLOWING
4/8/2008	8:24	8:24	0.1	0.1 BOILER UPSET
4/8/2008	12:54	12:54	0.1	0.1 BOILER UPSET
4/12/2008	5:36	5:36	0.1	0.1 SOOT BLOWING
4/12/2008	14:18	14:18	0.1	0.1 BOILER UPSET
4/12/2008	14:30	14:30	0.1	0.1 BOILER UPSET
4/12/2008	21:42	21:42	0.1	0.1 BOILER UPSET
4/13/2008	15:00	15:00	0.1	0.1 BOILER UPSET
4/13/2008	15:30	15:30	0.1	0.1 BOILER UPSET
4/13/2008	17:06	17:06	0.1	0.1 BOILER UPSET
4/13/2008	17:30	17:30	0.1	0.1 BOILER UPSET
4/14/2008	3:30	3:30	0.1	0.1 BOILER UPSET
4/14/2008	3:54	3:54	0.1	0.1 BOILER UPSET

4/14/2008	4:12	4:12	0.1	0.1 BOILER UPSET
4/14/2008	5:08	5:08	0.1	0.1 BOILER UPSET
4/14/2008	11:48	11:54	0.2	0.2 ASH HANDLING TROUBLE
4/14/2008	17:12	17:12	0.1	0.1 BOILER UPSET
4/24/2008	5:06	5:06	0.1	0.1 BOILER UPSET
4/24/2008	8:42	8:42	0.1	0.1 BOILER UPSET
5/19/2008	7:18	7:18	0.1	0.1 BOILER UPSET
5/19/2008	11:54	12:00	0.2	0.2 BOILER UPSET
5/22/2008	11:12	11:12	0.1	0.1 BOILER UPSET
5/22/2008	13:12	13:12	0.1	0.1 BOILER UPSET
6/1/2008	8:24	8:30	0.2	0.2 PRECIP. FIELD MAINTENANCE
7/8/2008	22:12	22:18	0.2	0.2 BOILER UPSET
9/8/2008	7:54	8:00	0.2	0.2 PRECIP. FIELD MAINTENANCE
9/8/2008	8:12	8:12	0.1	0.1 PRECIP FIELD MAINTENANCE
10/9/2008	7:12	7:24	0.3	0.3 PRECIP. FIELD MAINTENANCE
10/9/2008	7:36	7:36	0.1	0.1 PRECIP. FIELD MAINTENANCE
12/22/2008	14:18	14:30	0.3	0.3 PRECIP. FIELD MAINTENANCE
12/23/2008	20:24	20:30	0.2	0.2 PRECIP. FIELD MAINTENANCE
12/24/2008	10:12	10:12	0.1	0.1 PRECIP. FIELD MAINTENANCE
12/24/2008	10:24	10:24	0.1	0.1 PRECIP. FIELD MAINTENANCE
12/24/2008	11:30	11:30	0.1	0.1 PRECIP. FIELD MAINTENANCE
12/29/2008	8:30	8:30	0.1	0.1 PRECIP. FIELD MAINTENANCE
12/29/2008	9:54	10:06	0.3	0.3 PRECIP. FIELD MAINTENANCE
1/2/2009	13:00	13:12	0.3	0.3 PRECIP. FIELD MAINTENANCE
1/9/2009	13:30	13:48	0.4	0.4 PRECIP. FIELD MAINTENANCE
1/14/2009	13:24	13:30	0.2	0.2 PRECIP. FIELD MAINTENANCE
1/14/2009	13:42	13:42	0.1	0.1 PRECIP. FIELD MAINTENANCE
1/15/2009	8:06	8:24	0.4	0.4 PRECIP. FIELD MAINTENANCE
1/15/2009	9:18	9:24	0.2	0.2 PRECIP. FIELD MAINTENANCE
1/15/2009	9:42	9:42	0.1	0.1 PRECIP. FIELD MAINTENANCE
1/23/2009	9:42	9:48	0.2	0.2 PRECIP. FIELD MAINTENANCE
1/23/2009	10:48	10:54	0.2	0.2 PRECIP FIELD MAINTENANCE
2/4/2009	7:48	7:54	0.2	0.2 SOOT BLOWING
2/13/2009	6:18	6:24	0.2	0.2 SOOT BLOWING
7/2/2009	12:18	12:18	0.1	0.1 ASH HANDLING TROUBLE
7/2/2009	12:36	12:36	0.1	0.1 ASH HANDLING TROUBLE
11/17/2009	7:48	7:48	0.1	0.1 BOILER UPSET
12/5/2009	10:06	10:06	0.1	0.1 ASH HANDLING TROUBLE
12/5/2009	10:18	10:18	0.1	0.1 BOILER UPSET
12/8/2009	8:18	8:18	0.1	0.1 BOILER UPSET
12/8/2009	14:12	14:12	0.1	0.1 BOILER UPSET
12/10/2009	10:18	10:18	0.1	0.1 BOILER UPSET
12/22/2009	12:54	13:00	0.2	0.2 ASH HANDLING TROUBLE
12/24/2009	10:00	10:00	0.1	0.1 ASH HANDLING TROUBLE
1/11/2010	13:00	13:06	0.2	0.2 ASH HANDLING TROUBLE
1/11/2010	14:06	14:06	0.1	0.1 BOILER UPSET
1/28/2010	1:48	1:48	0.1	0.1 BOILER UPSET
2/5/2010	15:00	15:00	0.1	0.1 BOILER UPSET
2/9/2010	15:12	15:12	0.1	0.1 BOILER UPSET
2/9/2010	20:00	20:00	0.1	0.1 BOILER UPSET
2/12/2010	13:48	13:48	0.1	0.1 BOILER UPSET
2/12/2010	14:12	14:12	0.1	0.1 BOILER UPSET
3/14/2010	19:18	19:18	0.1	0.1 PRECIP. FIELD MAINTENANCE

3/31/2010 4:18 4:18 0.1 0.1 BOILER UPSET

De Young Unit 5

Date Occurred	Time Affected		Time (Hours)	Cause
	Start	Stop		
3/9/2006	11:12	11:16	0.20	0.2 PRECIP. RAPPER TROUBLE
5/4/2006	22:06	22:06	0.10	0.1 BOILER STARTUP
5/12/2006	16:42	16:42	0.10	0.1 BOILER UPSET
5/12/2006	18:12	18:18	0.20	0.2 BOILER UPSET
5/12/2006	21:30	21:36	0.20	0.2 BOILER UPSET
6/9/2006	22:24	22:24	0.10	0.1 BOILER UPSET
10/3/2006	11:48	11:48	0.10	0.1 PRECIP. FIELD MAINTENANCE
10/11/2006	10:24	10:24	0.10	0.1 BOILER UPSET
8/9/2007	8:18	8:18	0.10	0.1 PRECIP RAPPER TROUBLE
8/22/2007	4:42	5:18	0.70	0.7 PRECIP. REACT. TROUBLE
8/23/2007	0:30	0:36	0.20	0.2 PRECIP. REACT. TROUBLE
12/25/2007	18:18	18:24	0.20	0.2 BOILER STARTUP
3/2/2008	17:48	17:48	0.10	0.1 BOILER STARTUP
3/2/2008	18:18	18:24	0.20	0.2 BOILER STARTUP
4/15/2008	18:12	18:12	0.10	0.1 BOILER STARTUP
5/4/2008	18:12	18:12	0.10	0.1 BOILER STARTUP
5/4/2008	20:42	20:42	0.10	0.1 BOILER STARTUP
8/18/2009	10:36	10:42	<u>0.20</u>	0.2 BOILER UPSET